

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE et al

Plaintiffs,

V.

JASON GOODMAN et al

Defendants.

Case 3:17-cv-601-MHL

**PLAINTIFFS' MOTION FOR ENTRY
OF A PROTECTIVE ORDER**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Civil Rule 7, respectfully move the Court to enter a Protective Order.

A proposed Protective Order is attached hereto as Exhibit "A".

The arguments and legal bases for this motion are stated more fully in Plaintiffs' Memorandum in Support, being filed contemporaneously with this motion.

CERTIFICATION

Counsel for Plaintiffs and Defendant Negron have conferred. Counsel for Defendant Negron has reviewed and approved the Protective Order attached to this motion, and does not oppose this motion.

Counsel for Plaintiffs attempted to confer with Goodman in an effort to obtain Goodman's consent to the entry of an appropriate Protective Order. Goodman failed to respond to Plaintiffs' attempt to confer.

REQUEST FOR RELIEF

For the reasons stated above, Plaintiffs respectfully request the Court to grant their motion, and enter a Protective Order in this case.

DATED: June 24, 2019

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/Steven S. Biss

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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

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